

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TRYG INSURANCE a/s/o Toms Confectionery Group, and TOMS CONFECTIONERY GROUP,

Plaintiffs,

- against-

C.H. ROBINSON WORLDWIDE, INC., and NATIONAL REFRIGERATED TRUCKING, LLC.,

Defendants.

Case No. 3:15-cv- 05343 (MAS) (TJB)

Hon. Michael A. Shipp, U.S.D.J.

**NOTICE OF MOTION FOR SUMMARY JUDGMENT OF  
DEFENDANT C. H. ROBINSON WORLDWIDE, INC. PURSUANT  
TO LOCAL CIVIL RULE 7.1 AND RETURNABLE MAY 16, 2016**

PLEASE TAKE NOTICE that pursuant to L.Civ.R. 7.1, Defendant, Defendant, C. H. Robinson Worldwide, Inc. (hereinafter CHR), by and through its undersigned attorneys, hereby moves this Court, in the above entitled action, for summary judgment, dismissing Plaintiff's complaint against CHR , for the reasons set forth in the accompanying Memorandum Of Law In Support, Declaration of Barry N. Guterman and Affidavit of Christopher McLoughlin in support, and L.Civ.R. 56.1(a) Statement Of Material Facts Not In Dispute.

Dated: April 14, 2016

By: s/ Kenneth A. Olsen

Kenneth A. Olsen  
33 Philhower Road  
Lebanon, New Jersey 08833  
Phone: (908) 832-9207

-and-

Barry N. Guterman, Esq.  
Barry N. Guterman & Associates, P.C.  
85 Davids Way  
Bedford Hills, N.Y. 10507  
(212) 983-1466  
Attorneys for Defendant ABF Freight System, Inc.